

PANISH | SHEA | BOYLE | RAVIPUDI LLP
JESSE CREED, State Bar No. 272595

jcreed@psbr.law
11111 Santa Monica Boulevard, Suite 700
Los Angeles, California 90025
Telephone: 310.477.1700
Facsimile: 310.477.1699

Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF CALIFORNIA, FRESNO DIVISION

JOHN DOSCH; DANIELA COSTANTINI-
DOSCH; CHARLES DOSCH; ISABELLE
DOSCH,;

Plaintiffs,

v.

ITS LOGISTICS, LLC; HAUL KING
TRANSPORT LLC; WILLIAM EUGENE
THOMAS; and ITS NATIONAL, LLC.;

Defendants.

Case No. 1:22-cv-01443-ADA-CDB

**STIPULATION AND ORDER
COMPELLING DEFENDANT WILLIAM
EUGENE THOMAS TO APPEAR AT HIS
DEPOSITION**

The Hon. Ana de Alba

Assigned to the Hon. Christopher D. Baker for
Discovery Purposes

Trial Date: n/a

Plaintiffs and Defendants, by and through their counsel of record, hereby stipulate and request the Court to enter the stipulation as an order, as follows:

WHEREAS, Plaintiffs duly noticed the deposition of Defendant William Eugene Thomas for March 10, 2023 in Jefferson City, Missouri at 8:30 a.m. Central Time.

WHEREAS, Defendant William Eugene Thomas appeared for the deposition at 9:13 a.m. Central Time.

WHEREAS, as a result in part of Mr. Thomas' tardiness at the first deposition and counsel's need to catch flights to return home from Missouri, the Parties agreed to continue the remainder of the deposition of William Eugene Thomas for another date.

WHEREAS, Plaintiffs duly noticed the continuation of the deposition of Defendant

William Eugene Thomas for April 26, 2023 at 8:30 a.m. Pacific Time via remote deposition technology.

WHEREAS, on the noticed date and time, Defendant William Eugene Thomas failed to appear for his deposition.

WHEREAS, counsel for the Plaintiffs took a nonappearance at the deposition on the noticed date and time.

WHEREAS, pursuant to Rule 37(a), this Court is authorized to issue an order compelling discovery, including an order compelling a party to appear at his or her deposition.

NOW THEREFORE BE IT STIPULATED THAT Defendant William Eugene Thomas shall appear for a deposition noticed by Plaintiffs at a mutually agreeable time on or before June 1, 2023.

DATED: April 27, 2023

WILKINS, DROLSHAGEN & CZESHINSKI, LLP

By: _____

Michael Czeshinski
Question Cedar
Attorneys for Defendants Haul King Transport,
LLC & William Eugene Thomas

DATED: April 27, 2023

ROBISON, SHARP, SULLIVAN & BRUST

By: _____

Michael Burke, Esq.
Attorneys for Defendants ITS Logistics, LLC &
ITS National, LLC.

DATED: April 27, 2023

PANISH | SHEA | BOYLE | RAVIPUDI LLP

By: _____

Jesse Creed
Attorneys for Plaintiffs

1 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

2 IT IS SO ORDERED.

3
4 Dated: **April 27, 2023**


UNITED STATES MAGISTRATE JUDGE